

The Honorable Ricardo S. Martinez

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

RICK DAVIS, SR., MATHEW KOOHNS, and  
BRETT A. LOCKHART, SR., individually and  
on behalf of all others similarly situated,

Plaintiffs,

v.

UNITEDHEALTH GROUP  
INCORPORATED, UNITEDHEALTHCARE  
INSURANCE COMPANY,  
UNITEDHEALTHCARE OF WASHINGTON,  
INC., and UNITED HEALTHCARE  
SERVICES, INC.,

Defendants.

Case No. 2:21-cv-01220-RSM

**STIPULATED MOTION AND ORDER  
TO RE-NOTE PLAINTIFFS' MOTION  
TO COMPEL AND CORRESPONDING  
MOTION TO SEAL**

**NOTE ON MOTION CALENDAR:**

**December 4, 2024**

STIPULATED MOTION AND ORDER TO  
RE-NOTE PLAINTIFFS' MOTION TO  
COMPEL AND CORRESPONDING MOTION  
TO SEAL - Case No. 2:21-CV-01220-RSM

GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue,  
Los Angeles, CA 90071-3197  
213.229.7000

Under Local Civil Rules 7(d)(1) and 10(g), Plaintiffs Rick Davis, Sr., Mathew Koohns, and Brett A. Lockhart, Sr. (collectively “Plaintiffs”) and Defendants United Health Group Incorporated, UnitedHealthCare Insurance Company, UnitedHealthCare of Washington, Inc. and UnitedHealthCare Services, Inc. (collectively “Defendants”) stipulate as follows:

WHEREAS Plaintiffs filed a Motion to Compel (Dkt. 60) and Motion to Seal (Dkt. 59) on November 20, 2024;

WHEREAS Plaintiffs’ Motion to Compel is noted for December 11, 2024;

WHEREAS, under Local Civil Rule 7(d)(3), United’s Opposition to Plaintiffs’ Motion to Compel and Response to Plaintiffs’ Motion to Seal currently are due to be filed on or before December 5, 2024;

WHEREAS, on December 4, 2024, UnitedHealthcare C.E.O. Brian Thompson was murdered while attending a company investor conference in New York City<sup>1</sup>;

WHEREAS due to that tragic event, UnitedHealthcare and its affiliated companies have implemented extensive security protocols to ensure the safety of its employees;

WHEREAS, as a result of those security protocols, counsel for Defendants are not able to obtain the information and approval they need to complete their Opposition to Plaintiffs’ Motion to Compel and Response to Plaintiffs’ Motion to Seal;

WHEREAS the parties jointly agree that the hearing on Plaintiffs’ Motion to Compel shall be re-noted for December 18, 2024.

Therefore, the Parties request that the Court grant this Stipulated Motion, re-noting Plaintiffs’ Motion to Compel for December 18, 2024. The parties shall file their responses and reply briefs consistent with the amended noting date.

DATED: December 4, 2024

---

<sup>1</sup> See <https://www.nytimes.com/live/2024/12/04/nyregion/brian-thompson-uhc-ceo-shot>

By: /s/ Andrew Goldfarb

By: /s/ Heather L. Richardson

ZUCKERMAN SPAEDER LLP

GIBSON, DUNN & CRUTCHER LLP

Andrew Goldfarb  
1800 M. Street NW, Ste 1000  
Washington, DC 20036  
E-mail: agoldfarb@zuckerman.com

Heather L. Richardson (*pro hac vice*)  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: +1 213.229.7409  
Facsimile: +1 213.229.6409  
E-mail: HRichardson@gibsondunn.com

ZUCKERMAN SPAEDER LLP

Brian Hufford  
Jason Cowart  
485 Madison Ave., 10<sup>th</sup> Floor  
New York, NY 10022  
Email: dbhufford@zuckerman.com  
Email: jcowart@zuckerman.com

Lauren M. Blas (*pro hac vice*)  
333 South Grand Avenue  
Los Angeles, CA 90071  
Telephone: + 1 213.229.7503  
Facsimile: +1 213.229.6503  
Email: LBlas@gibsondunn.com

SIRIANNI YOUTZ SPOONEMORE  
HAMBURGER

LANE POWELL PC

Eleanor Hamburger  
3101 Western Ave., Suite 350  
Seattle, WA 98121  
Email: ehamburger@sylaw.com

s/Erin M Wilson  
Barbara J. Duffy, WSBA No. 18885  
Erin M. Wilson, WSBA No. 42454  
1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
Seattle, Washington 98111-9402  
Telephone: 206.223.7000  
duffy@lanepowell.com  
wilsonem@lanepowell.com

*Attorneys for Plaintiffs*

*Attorneys for Defendants*

This Memorandum contains 244 words in  
compliance with the Local Civil Rules

## ORDER

Based on the foregoing Stipulation, IT IS SO ORDERED. Plaintiff's Motion to Compel and their corresponding Motion to Seal are re-noted for December 18, 2024.

DATED this 5<sup>th</sup> day of December, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

STIPULATED MOTION AND PROPOSED  
ORDER TO RE-NOTE PLAINTIFFS'  
MOTION TO COMPEL AND  
CORRESPONDING MOTION TO SEAL - 2  
Case No. 2:21-CV-01220-RSM

GIBSON, DUNN & CRUTCHER LLP  
333 South Grand Avenue,  
Los Angeles, CA 90071-3197  
213.229.7000